UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

)

JUDGE DAN A. POLSTER

Goldman & Rosen, Ltd.,

Plaintiff(s),))) CASE No. 5:10-CV-1894							
vs.)							
OneBeacon Insurance Company,))							
Defendant(s)))							
REPORT OF PARTIES' PLANNING MEETING UNDER FED.R.CIV.P. 26(f) AND LR 16.3(b)(3)								
1. Pursuant to Fed.R.Civ.P. 26(f	f) and LR 16.3(b)(3), a meeting was held							
on November 5, 2010, and was attended by:								
Keven Drummond Eiber, Counsel for plaintiff(s)	Goldman & Rosen, Ltd.							
John Travis , Counsel for defendan	ats(s) OneBeacon Insurance Co.							
, Counsel for defendan	ut(s)							
, Counsel for defendan	ut(s)							
2. The parties:								
have not been required to make initial	l disclosures.							
X have exchanged the pre-discovery dis	sclosures required by Fed.R.Civ.P. 26(a)(1							

Expedited	X Standard	Complex				
Administrative	Mass Tort					
3. This case for one or	more of the following Al	ternative Dispute				
Resolution (ADR) mechanisms:						
Early Neutral EvaluationX	Mediation A	Arbitration				
Summary Judgment Trial _	Summary Bench Trial					
Case not suitable for ADR						
4. The parties	do X do not consent	to the jurisdiction				
of the United States Magistrate Judge purs	uant to 28 U.S.C. § 636(c).					
5. The parties agree that	this case doesX	does not involve				
electronic discovery.						
6. Recommend Discovery	Plan (Counsel are remind	led to review the				
default standard for e-discovery set forth in Appendix K to the Local Rules):						
(a) Describe the su	bjects on which discovery is	to be sought, the				
nature and extent of discovery and any potential problems: Liability and damages.						
(b) Describe antici	pated e-discovery issues (i	i.e, what ESI is				
available and where it resides; ease/di	fficulty and cost of produc	cing information;				
schedule and format of production; pr	eservation of information;	agreements about				
privilege or work-production protection,	etc.): The parties do not anti-	cipate e-discovery				
issues. E-discovery likely is limited to the	production of e-mail commu	nications.				
(c) Describe handl	ing of expert discovery (i	i.e, timetable for				
disclosure of names and exchange of repo	orts, depositions): The parties	s do not anticipate				
the use of experts at this time.						

		(d)	Disco	very Deadlines	S:				
			(i)	Liability:	May 27, 2011				
			(ii)	Damages:	May 27, 2011	<u> </u>			
	7.	Recon	nmende	d dispositive n	notion date:	June 17	, 2011		
	8.	Recon	nmende	d cut-off for	amending the	pleading	gs and or	adding	
		additio	onal par	ties:	<u>December 1, 2010</u>				
	9.	Recommended date for status hearing and/or final pretrial s							
		confer	ence:		May 31, 2010				
	10.	Other	matters	for the attention	on of the Court:	The	parties	are	
submitting	g a joint	propos	sed prot	ective order us	sing the Court's	form and	d request th	at it be	
entered.									
Attorney for l	Plaintiff	s:			Kever Brous 600 S Cleve Telep Facsi	n Drumme e McDow uperior A land, Ohi hone: (21	6) 830-6830 5) 830-6807	0043746) uite 1600	
					Brous 388 S Akror Telep Facsii	e McDow . Main St n, Ohio 44 hone: (33	0) 535-571 0) 253-8601	500 1	
Attorney	for Defe	ndants:			John l Gallaş Sixth	gher Shar	(0011247) p llkley Bldg.		

Case: 5:10-cv-01894-DAP Doc #: 13 Filed: 11/15/10 4 of 4. PageID #: 96

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the foregoing Report of the Parties' Plannign Meeting was filed electronically this 15th day of November, 2010. Notice of the filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Keven Drummond Eiber Keven Drummond Eiber (0043746)